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Attorneys for Plaintiff

CHARLES ADAMS

UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHARLES ADAMS, on behalf of himself and
others similarly situated,

Plaintiff,

v.

GOODMAN NETWORKS, INC.; JAMES E.
GOODMAN; JOHN A. GOODMAN; JOHN
DEBUS; JAMES E. NALLEY; ALEX BABER;
JIMMY HULETT; MIKE SMITH; SCOTT
PICKETT; and DOES 1 through 500,

Defendants.

Case No. C0501973 PJH

**STIPULATED REQUEST FOR ORDER
SHORTENING TIME TO HEAR JOINT
MOTION FOR ORDER (1)
PROVISIONALLY CERTIFYING A
SETTLEMENT CLASS, (2)
PRELIMINARILY APPROVING
CLASS AND COLLECTIVE
SETTLEMENT, (3) DIRECTING
DISTRIBUTION OF NOTICE OF
SETTLEMENT AND OPPORTUNITY
TO OPT OUT, AND (4) SETTING A
HEARING FOR FINAL APPROVAL;
AND MOTION FOR PRELIMINARY
APPROVAL OF AN AWARD OF
ATTORNEYS' FEES AND COSTS AND
AN AWARD OF AN ENHANCEMENT
PAYMENT TO PLAINTIFF**

[~~PROPOSED~~] ORDER

Date: June 14, 2006 (requested)
Time: 9:00 a.m.
Judge: PHYLLIS J. HAMILTON

STIPULATED REQUEST FOR ORDER SHORTENING TIME

Pursuant to Northern District Local Rule 6-2, Class Counsel for Plaintiff Charles Adams, on behalf of himself and others similarly situated, and Counsel for Defendants Goodman Networks, Inc., James E. Goodman, John A. Goodman, John Debus, James E. Nalley, Alex Baber, Jimmy Hulett, Mike Smith, and Scott Pickett (jointly referred to hereafter as “Parties”) stipulate as follows:

1. The Parties request an Order shortening the time to hear the (a) Joint Motion For Order Provisionally Certifying A Settlement Class, Preliminarily Approving Class And Collective Settlement, Directing Distribution Of Notice Of Settlement And Opportunity To Opt Out, And Setting A Hearing For Final Approval, and (b) Motion for Preliminary Approval of an Award of Attorneys’ Fees and Costs and an Award of an Enhancement Payment to Plaintiff, from 35 days notice under Northern District Local Rule 7-2, to 10 days notice as permitted under Local Rule 6-1(b).

2. The Parties seek to shorten time because one of the material terms of the arms-length and fair, global collective and class action settlement is that payment to all settlement class members, and payment of fees and costs, must be made by December 31, 2006. Given the complex timetable negotiated between the Parties, including payment of \$1,000,000 on October 1, 2006, less Court-approved attorneys’ fees (see Paragraphs 7, 21, 27, and 31-45 of the Joint Stipulation of Settlement and Release submitted herewith), 35 days notice to hear the joint motions will seriously jeopardize accomplishing the goal of making final payments on or before December 31, 2006.

3. There have been no previous time modifications in this case, either by stipulation or Court Order, other than a 7 day extension that Plaintiff granted Defendants to file a responsive pleading.

4. The requested time change will have a positive effect on this case. Namely, Defendants will be able to meet the stipulated deadline of paying all settlement sums to the class, and all attorneys' fees and costs to class counsel, on or before December 31, 2006.

5. There will be no Opposition or Reply to the Joint Motion filed.

Class Counsel and Defendants' Counsel declare under penalty of perjury under the laws of the State of California that the forgoing is true and correct:

CLASS COUNSEL:

DATED: May 30, 2006

LAW OFFICES OF JARED E. PETERSON

By /s/ Jared E. Peterson
Jared E. Peterson
Attorneys for Plaintiff and Class

DATED: May 30, 2006

FLYNN, DELICH & WISE LLP

By /s/ James B. Nebel
James B. Nebel
Attorneys for Plaintiff and Class

DEFENDANTS' COUNSEL:

DATED: May 30, 2006

SEYFARTH SHAW LLP

By /s/ Anthony J. Rao
Anthony J. Rao
Attorneys for Defendants

~~[PROPOSED]~~ ORDER

GOOD CAUSE APPEARING, PURSUANT TO STIPULATION IT IS SO ORDERED THAT the hearing on the (a) Joint Motion For Order Provisionally Certifying A Settlement Class, Preliminarily Approving Class And Collective Settlement, Directing Distribution Of Notice Of Settlement And Opportunity To Opt Out, And Setting A Hearing For Final Approval, and (b) Motion for Preliminary Approval of an Award of Attorneys' Fees and Costs and an Award of an Enhancement Payment to Plaintiff, will be heard on 10 days notice on permitted under Northern District Local Rule 6-1(b), and not on 35 days notice. The hearing date for the above joint motions is June 14, 2006 at 9:00 a.m.. There will be no Opposition or Reply to the motions filed.

5/31/06

